



UNITED STATES ENVIRONMENTAL PROTECTION

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

CTO 082

COMMENTS  
ON WORKPLAN  
ALICE, COREY,  
CLAUDE

June 21, 1995

Via Facsimile

Ms. Content Garriga.  
Department of the Navy  
Southwest Division  
125 Pacific Highway, Code 1332.CG  
San Diego, CA 92132

RE: Review and Comment on Draft Work Plan Assessment Report for the Points of Interest at Naval Training Center, San Diego

*Content*  
Dear Ms. Garriga:

As I informed you by telephone on June 14, 1995, EPA has completed its review of the Draft Work Plan Assessment Report for the Points of Interest (POIs) at Naval Training Center, San Diego. I apologize that this written confirmation of EPA's comments is a bit late but I was on personal leave from work June 15 through June 19, 1995. As I told you in my phone message, the draft work plan for the POIs is well written and EPA has very few comments.

The primary revision EPA would like to see to the final work plan would be the addition of language to the Field Sampling Plan explaining/justifying the number of borings proposed to adequately characterize a POI site. In particular, this language should be added to the FSP for the POIs for which very limited sampling (shallow depth and/or limited number of borings/scil samples) is proposed. At this point, EPA does not have sufficient information to concur that these limited sampling proposals are adequate to characterize any potential problems or lack thereof. A few brief sentences supporting the proposed sampling regime for some of the POIs would be helpful. Please feel free to call me and discuss this further.

One additional minor comment is summarized briefly below.

- 1) Introduction. Please briefly describe the overall POI program. Explain as something POIs total - some PAs and some SAs and how rare for acute at these sites determined, etc. This will help EPA and the public to understand the overall picture a bit better.
- 2) Page 1-18, 1st paragraph. Please provide some additional detail regarding the "outdoor hazardous materials storage area."

OPTIONAL FORM 98 (7-90)

FAX TRANSMITTAL

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|---------------------------------|----------------------|
| Content Garriga                 | To: C. Trombadoro    |
| Dept./Agency                    | From:                |
| SWDIV, Code 1332.CG             | Phone: 415-744-2409  |
| Fax #                           | 415-744-1916         |
| 619-532-3469                    | NSN 7500-01-317-7365 |
| GENERAL SERVICES ADMINISTRATION |                      |

such as the types of items stored there and whether or not the Navy intends to add overhead protection at some later date.

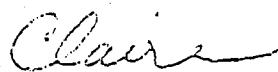
3) Pg. 1-22, POI 29, second paragraph. Please elaborate regarding the source (report, eye-witness) of the report that the lead contaminated soil associated with building 102 was excavated and removed. EPA made a similar comment in its review of the FOISL for Building #17.

4) Pg. 1-34, second to last sentence in last paragraph. Will the work be performed per the work plan determine whether or not "these recommendations were followed?" If yes please add a sentence to include this in the revised work plan.

5) In the final work plan add some brief language about the next steps after the currently proposed work is completed should additional action appear warranted. Would these PCIs be converted to RAB's? A couple of sentences regarding next steps could be added under 3.2.2.

Thank you for the opportunity to review this document and I will discuss it further at the RAB meeting.

Sincerely,



Claire Trembladore  
Remedial Project Manager

cc: Gidano, DMSO  
Navy